

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

To Chief Judge Colleen McMahon:

**Re: Motion to Proceed Pseudonymously**

Your Honor,

19 CV 11328

I am currently a graduate student at a private Ivy-league university. I file this motion to protect my present focus and future aspirations from unnecessary and unwelcome distractions to my graduate studies.

While I was an undergraduate at Defendant Columbia I suffered a sexual assault and a physical assault, to which Defendant did not properly respond. Columbia, in violation of Title IX, weaponized its office to discriminate against me on the basis of my sexual orientation.

As such, my Complaint includes sensitive health information regarding emergency medical and psychiatric treatment for these assaults, which could have deleterious consequences if this information became public record.

Columbia has many outstanding legal resources with which it can retaliate against me.

These factors taken together serve the basis for my motion to proceed pseudonymously.

I wish to litigate the facts of this case without the potential frenzy of media attention that sexual assault cases at universities like Columbia usually warrant (i.e. Nungesser/Mattress Girl Case, Roskin-Frazee, etc.).

Lastly, due to my race and sexual orientation (as a gay African-American male), I fear retaliation and reproach from an unscrupulous public if this information was to extend into my fledgling professional life and beyond the confines of this matter.

For these reasons, I seek accommodation from the court with this motion to file pseudonymously.

Respectfully submitted,

John Doe

December 5, 2019

